

LAW OFFICES OF JILL R. SHELLOW

Telephone: 212.792.4911 / Fax: 212.792.4946 / jrs@shellowlaw.com
All correspondence to: 80 Broad Street, Suite 1900, New York, NY 10004

July 8, 2020

BY ECF AND EMAIL

The Honorable Laura T. Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007
SwainNYSDCorresp@nysd.uscourts.gov

RE: *United States v. Constantinescu, et al.*, 19-cr-651 (LTS)

Dear Judge Swain:

I am writing in response to the June 30, 2020 email that I received from Your Honor's chambers about the status conference scheduled for July 15, 2020. As Your Honor requested, I have been in touch with the prosecutors and canvassed defense counsel. All counsel agree that an in-person conference with all defendants is not feasible now. Accordingly, we respectfully request that Your Honor adjourn the July conference to a date in mid-September 2020. All defense counsel join in this request and agree to the exclusion of this time under the Speedy Trial Act, 18 U.S.C. § 3116(h)(7)(A). The Government consents to this request.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow

cc: All counsel (by email and ECF)